

UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

David Goulding, Howard Salamon, Robin Goulding)
and John O'Shea)
) Case No. 1:22-cv-05224
Plaintiffs)
) Judge Sharon Johnson Coleman
vs.)
)
Mark Miller)
)
Defendant)

MOTION FOR ADDITIONAL TIME TO RESPOND TO FIRST AMENDED
COMPLAINT

Now Comes the Defendant, Mark Miller, and moves this Court for an extension of time of 28 days to respond to the Plaintiffs' First Amended Complaint for the following reasons:

1. Defendant is incarcerated in a federal penitentiary in Minnesota.
2. Defendant has been communicating with his attorneys through his wife.
3. Defendant's attorney has recently been unable to contact Defendant's wife after numerous email attempts.
4. Defendant's attorneys need to discuss responses to the First Amended Complaint with Defendant in order to file a response with this Court.
5. Plaintiffs' counsel has represented that he has no objection to a 28 day extension for Defendant to file his Response to First Amended Complaint.

Wherefore, for all of the above reasons, Defendant prays for an order granting him an additional 28 days to file a response to Plaintiffs' First Amended Complaint.

Respectfully submitted,

Thomas F. Burke

Attorney for the Defendant

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